

RONALD SULLIVAN LAW, PLLC

Ronald S. Sullivan Jr.

January 26, 2024

BY ECF

The Honorable Eric R. Komitee
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 112011

Re: U.S. v. Carlos Watson and Ozy Media, Inc.

Dear Judge Komitee:

On behalf of Mr. Watson and OZY Media, Inc., and with Ms. Frison's consent, I write to request that the Court stay and hold this case in abeyance until the Circuit takes action on the Petition for a Writ of Mandamus (Case No. 24-3037) that was filed on November 18, 2025, docketed on November 19, 2024, and in support of which an addendum was filed earlier today. Mr. Watson sought this relief on November 18, 2024 (Docket No. 337) but the petition had then not yet been docketed, and the application did not report the government's position. The government opposes this application.

Alternatively, Mr. Watson and OZY request that the Court permit the defendants' sentencing memoranda to be filed on Monday, December 2, 2024. The Court's rules require memoranda to be filed two weeks before sentencing, which here is November 29, 2024, the Friday of the holiday weekend. Because of counsels' professional and/or personal commitments this week, they require this coming Saturday and Sunday to complete and file their submission.

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The government opposes this request unless the Court also adjourns the government's corresponding deadline by three days without adjourning sentencing, in which case the government takes no position.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Sullivan Jr.', with a stylized flourish at the end.

Ronald S. Sullivan Jr.